



BURBANK HOUSING DEVELOPMENT CORPORATION

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January 27, 2011

VIA E-Mail: Dale Bowyer dbowyer@waterboards.ca.gov

Bruce Wolf, Executive Director
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, California 94612

RE: Comment Special Projects Proposal/LID Treatment Reduction Credits MRP
Provision C.3.e.ii.(2)

Dear Mr. Wolf:

On behalf of Burbank Housing, and more generally for the cause of affordable housing opportunity, we wish to comment on the proposed BASMAA Special Projects Proposal/LID Treatment Reduction Credits for MRP Provision C.3.e.ii.(2). We greatly appreciate the time and care with which the seventy-six (76) Bay Area Stormwater Management Agencies Association (BASMAA) permittees have worked together and with your staff to define the proposed Special Projects categories that will apply regionally to encourage infill project development where institutional barriers and site-specific constraints may limit the application of the LID treatment measures allowed by the Municipal Regional Permit (MRP) Provision C.3.

Nearly all affordable housing being developed in the Bay Area is designed as medium to high density housing based on smart growth design principles. We are trying to maximize the efficiency of urban space, often on infill parcels. We believe that this approach to development minimizes all environmental concerns including the storm water runoff because many more people are living on less land area. One of the tradeoffs, though, is that there is less landscaped and natural area remaining to serve water treatment purposes. We firmly believe that the basic efficiency of smart growth needs to be considered as an important factor in assessing the degree to which this type of development needs to treat runoff.

Our recent experience is that meeting the increasingly rigorous storm water treatment standards is adding significant costs to affordable housing development. In this era of shrinking financial resources for housing, storm water treatment requirements are becoming an increasingly significant restraint to the provision of affordable housing.



More generally, it could become a significant constraint for all higher density housing in light of current market values in relation to development costs.

The main point here is this: large lot traditional development has much greater opportunities for lower cost compliance options to provide storm water treatment. The financial burden of more rigorous water treatment requirements ironically falls much more heavily on smart growth development, which includes nearly all affordable housing development. It is both logical and equitable that smart growth and affordable housing be recognized as essential public policy priorities. Further, the inherent benefits of this development pattern for a cleaner environment also must be recognized.

We ask that you please adopt the BASMAA proposal as an important first step to modify the MRP and bring Water Board policy in line with the Federal, State, and regional emphasis on smart growth and housing opportunity.

Sincerely,

A handwritten signature in black ink, appearing to read "John Lowry", with a long, sweeping horizontal line extending to the right.

John Lowry

Executive Director

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jlowry@burbankhousing.org

